

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JULY 1, 2022 THROUGH JULY 31, 2022**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 21-30589-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: October 14, 2021 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

☐ Interim Fee Application No. _____ or ☐ Final Fee Application

Summary of Amounts Requested for the Period from July 1, 2022 through July 31, 2022 (the "Ninth Statement Period").

Total Fees – LTL Bankruptcy:	\$176,499.50
Total Fees – Imerys Bankruptcy (50% of total):	+ <u>\$0.00</u>
Total Fees:	\$176,499.50
Total Disbursements:	+ <u>\$0.00</u>
Total Fees Plus Disbursements:	\$176,499.50
Minus 20% Holdback of Fees:	– <u>\$35,299.90</u>
Amount Sought at this Time:	\$141,199.60

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	<u>\$1,635,711.00</u>	<u>\$1,749.23</u>	<u>\$1,637,460.23</u>
Total Fees Allowed to Date:	<u>\$554,101.45</u>	<u>\$1,007.51</u>	<u>\$555,108.96</u>
Total Retainer (If Applicable):	<u>\$0.00</u>	<u>\$0.00</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$211,281.20</u>	<u>n/a</u>	<u>\$211,281.20</u>
Total Received by Applicant:	<u>\$1,357,108.11</u>	<u>\$1,749.23</u>	<u>\$1,358,857.34</u>

Summary by timekeeper included in this Fee Application – LTL Bankruptcy

Name of Professional	Title	Rate	Hours	Fees
Evans, Andrew	Partner	\$825	21.1	\$17,407.50
Grinberg, Rachel	Partner	\$900	0.6	\$540.00
Lobel, Scott	Partner	\$750	65.1	\$48,825.00
Mullin, Charles	Partner	\$1,150	27.8	\$31,970.00
Aharoni, Assaph	Manager	\$600	0.5	\$300.00
Peters, Sarah	Manager	\$600	14.6	\$8,760.00
Wieman, Christopher	Director	\$550	0.3	\$165.00
Xu, Alicia	Senior Economist	\$545	14.5	\$7,902.50
Coleman, Nathan	Consultant II	\$390	35.2	\$13,728.00
Stewart, Samantha	Consultant II	\$410	88.7	\$36,367.00
Weiss, David	Consultant	\$365	4.2	\$1,533.00
DeChurch, Cameron	Project Coordinator	\$255	35.3	\$9,001.50
TOTAL			307.9	\$176,499.50

Summary by timekeeper included in this Fee Application – Imerys Bankruptcy

Name of Professional	Title	Rate	Hours	Fees
N/A			N/A	N/A
TOTAL			0.0	\$0.00
50% OF TOTAL			0.0	\$0.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED – LTL BANKRUPTCY	HOURS	FEES
Analysis	83.7	\$64,633.00
Client Communication	15.4	\$12,657.50
Data Gathering & Processing	145.7	\$63,685.00
Fee Request Preparation	15.4	\$9,566.00
Project Management	14.7	\$11,700.00
Research	33.0	\$14,258.00
SERVICE TOTALS	307.9	\$176,499.50

SERVICES RENDERED – IMERY'S BANKRUPTCY	HOURS	FEES
N/A	N/A	N/A
SERVICES TOTAL	0.0	\$0.00
50% OF SERVICES TOTAL	0.0	\$0.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENT TYPE – LTL BANKRUTPCY	AMOUNT
N/A	
DISBURSEMENTS TOTAL	\$0.00

DISBURSEMENT TYPE – IMERYS BANKRUTPCY	AMOUNT
N/A	
DISBURSEMENTS TOTAL	\$0.00

**SECTION IV
CASE HISTORY**

1. Case Filed: October 14, 2021 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: February 15, 2022, effective as of the Petition Date [Dkt. 1483] (the “Retention Order”).¹
4. Summary explaining the nature of the work performed and the results achieved:²

During the Ninth Statement Period, Bates White provided the following services including, but not limited to:

- Drafting proposals for potential approaches to gathering information for claim valuation analyses.
- Processing and analyzing publicly available data related to disease incidence.
- Reviewing epidemiological literature related to forecasting disease incidence.
- Preparing for and participating in mediation.
- Developing alternative approaches to valuation analyses given available data and timelines.
- Providing input on options for potential discovery.
- Preparing the Eighth Monthly Fee Statement for fees incurred in June.

I certify under penalty of perjury that the above is true.

¹ The Retention Order is attached hereto as Exhibit B.

² The invoice detail and expense detail submitted hereto as Exhibit C, includes detailed time and expense entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.

Dated: September 6, 2022
Washington, DC

Respectfully submitted,

/s/ Scott M. Lobel

Scott M. Lobel

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TALC CONSULTANTS FOR DEBTOR